

Atty. Docket No. YOR20010010US1  
(590.043)

**REMARKS**

Applicants and the undersigned are most grateful for the time and effort accorded the instant application by the Examiner. It is respectfully noted that because the statutory date for this application falls on a federal holiday (Thanksgiving), this response filed on the first available business day after said holiday is appropriate. The Office is respectfully requested to reconsider the rejections presented in the outstanding Office Action in light of the following remarks.

Claims 1-17 were pending in the instant application at the time of the outstanding Office Action. Claims 1, 9, and 17 are independent claims; the remaining claims are dependent claims. Claims 1, 9, and 17 have been rewritten. Applicants intend no change in the scope of the claims by the changes made by this amendment. It should also be noted these amendments are not in acquiescence of the Office's position on allowability of the claims, but merely to expedite prosecution.

Claims 1-4, 9-12, and 17 stand rejected under 35 USC § 103(a) as being unpatentable over Flanagan et al. (hereinafter "Flanagan") in view of Wynn. Claims 5 and 13 stand rejected under 35 USC 21 103(a) as being unpatentable over Flanagan in view of Wynn and further in view of Beirle. Claims 6 and 14 stand rejected under 35 USC § 103(a) as being unpatentable over Flanagan in view of Wynn, Beirle and further in view of Sonmez et al. (hereinafter "Sonmez"). Claims 7 and 15 stand rejected under 35 USC § 103(a) as being unpatentable over in view of Wynn, Beirle, Sonmez and further in

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view of Ammar et al. (hereinafter "Ammar"). Reconsideration and withdrawal of the present rejections is hereby respectfully requested.

As best understood, Flanagan appears to be directed to a speech recognition system for use in an environment where the speaker is at a distance from the sound pickup device. (Col. 1, lines 14-17) In particular, Flanagan appears to transform distant speech (speech recorded with a distant mic) into close-talk speech (speech recorded with a close mic) using a neural network. The training of the neural network uses two recordings: speech from the same source recorded by a far away mic and a close mic. Thus, Flanagan is utilizing and training signals from two distinct channels, even though the two signals may not necessarily be different or dissimilar. It is respectfully asserted that Flanagan fails to teach a normalizing arrangement that utilizes a multi-channel CDCN. In fact, there is not even a mention in Flanagan of Codeword-Dependent Cepstral Normalization or the utilization thereof, let alone any mention or suggestion of multi-channel CDCN.

Wynn fails to overcome the deficiencies of Flanagan as shown above. Wynn similarly does not mention or teach CDCN, or any form thereof. Likewise, Beirle also has no mention of such a normalization scheme. Although Sonmez does mention the usage of CDCN and FCDCN in the prior art, he fails to teach or suggest the utilization of a multi-channel Codeword-Dependent Cepstral Normalization. FCDCN produces better recognition accuracy by developing a more fine-grained set of compensation vectors for a particular testing environment. As is well known in the art, this is not equivalent to a

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multi-channel CDCN. Finally, Ammar also fails to overcome the deficiency of Flanagan. Ammar also fails to teach a multi-channel CDCN as claimed in the instant invention.

A 35 U.S.C. 103(a) rejection requires that the combined cited references provide both the motivation to combine the references and an expectation of success. Not only is there no motivation to combine the references, no expectation of success, but actually combining the references would not produce the claimed invention.

Thus, none of the references cited in the outstanding Office Action, in combination with Flanagan, meet the limitation of the independent claims. Correspondingly, none of these references in combination with Flanagan meet the limitations of the dependent claims that they allegedly reject under 35 USC § 103(a). Thus, the claimed invention is patentable over the combined references and the state of the art.

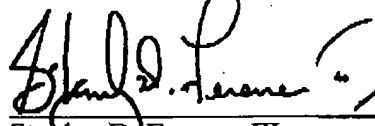
By virtue of dependence from what are believed to be allowable independent Claims 1 and 9, it is respectfully submitted that Claims 2-8 and 10-16 are also presently allowable. Applicants acknowledge that Claims 8 and 16 were indicated by the Examiner as being allowable if rewritten in independent form. Applicants reserve the right to file new claims of such scope at a later date that would still, at that point, presumably be allowable.

In summary, it is respectfully submitted that the instant application, including Claims 1-17, is presently in condition for allowance. Notice to the effect is hereby

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earnestly solicited. If there are any further issues in this application, the Examiner is  
invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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